

REMARKS/ARGUMENTS

Applicant would like to thank the Examiner for the careful consideration given the present application. The application has been carefully reviewed in light of the Office Action, and amended as necessary to more clearly and particularly describe the subject matter that Applicant regards as the invention. Review of the subject application in view of the present remarks is respectfully requested.

Applicant has amended claim 1. Support for the amendments can be found in paragraphs 0060-0062 and Figs. 7 and 8 of the published application (No. 2007/0030212). Claim 6 has been amended to insert consistent language. Claims 2-5 and 11 have been cancelled.

The Examiner has objected to claims 2 and 6 due to informalities. Applicant has cancelled claim 2 and claim 6 has been amended based on amended claim 1. Applicant submits that the informalities have been corrected. Applicant requests that the objection be withdrawn.

Claims 1, 3 and 7 are rejected under 35 U.S.C. 102(e) as being anticipated by Sato (U.S. Patent Application No. 2003/0108222), hereinafter "Sato".

Applicant respectfully asserts that Sato fails to disclose every element of amended claim 1. Sato fails to disclose that an image combining unit combines "the vehicle outside-image information which is obtained by combining the vehicle outside-image information captured by the first vehicle with the vehicle outside-image information captured by the second vehicle ahead of the first vehicle" received from the first vehicle with "the image captured by the vehicle outside-image capturing unit" to produce renewed vehicle outside-image information as limited by claim 1. Sato discloses that the image displaying device 14 displays a combined image obtained by combining an image captured by a blind spot camera 13a equipped with the vehicle

(see Fig. 22, paragraph 0125-0127). Sato only discloses the blind spot camera and the driver's viewpoint camera which are equipped with the same vehicle. Thus, Sato fails to disclose the "vehicle outside-image information...is obtained by combining the vehicle outside-image information captured by the first vehicle with the vehicle outside-image information captured by the second vehicle ahead of the first vehicle" as claimed in claim 1. As Sato fails to disclose every element of claim 1, Sato fails to anticipate claim 1.

Claim 7 depends directly or indirectly on claim 1, and thus is patentable for at least the same reasons as the parent claim.

Claims 2, 4, and 9-11 were rejected under 35 U.S.C. 103(a) as being unpatentable over Sato in view of Sakamoto et al. (U.S. Patent No. 6,879,241), hereinafter "Sakamoto". For at least the following reasons, the Examiner's rejection is respectfully traversed. The asserted combination of Sato in view of Sakamoto, independently or in combination, does not teach or suggest all features of the claimed invention.

Regarding claims 9 and 10, which depend from claim 1, and as explained with regard to claim 1, Sato fails to disclose that an image combining unit combines "the vehicle outside-image information which is obtained by combining the vehicle outside-image information captured by the first vehicle with the vehicle outside-image information captured by the second vehicle ahead of the first vehicle" received from the first vehicle with "the image captured by the vehicle outside-image capturing unit" to produce renewed vehicle outside-image information as limited by claim 1. Further, Applicant respectfully submits that there is no teaching of having a second vehicle (*that is ahead of the vehicle*) capturing outside-image information and combining the second outside-image information with a first vehicle (*that is ahead of the vehicle*) outside-image information in Sakamoto. Therefore, even if Sakamoto were combined with Sato, every

limitation of claim 1 would not be taught, suggested, or otherwise rendered obvious or predictable by the resulting combination. Thus, Applicant respectfully submits that claims 9 and 10 are patentable over the prior art of record.

Furthermore, regarding the combination of Sato and Sakamoto, Sato discloses a vehicle having two cameras that combine the rearward views to create a single image. Thus, the only communication in Sato is occurring within the vehicle itself. Sakamoto discloses a communication system between vehicles but discloses that communication only occurs with another vehicle having a key card or identification module with an embedded identification code. On numerous occasions, Sakamoto stresses the importance of a secure network and provides detail on the key cards, but specifically "...provide[s] a vehicle ready for a card key and a radio communication system for a vehicle which utilizes a card key wherein transmission and reception functions are incorporated in a card key to be loaded onto a vehicle thereby to allow communication between vehicles" and that "Each of the card keys 911a and 911b loaded in the two card key receiving slots includes an ID unique to itself and a transmitter-receiver." See Col. 1, lines 51-57 and Col. 15, lines 25-28, respectively. Further, Sakamoto provides additional security measures in that if a card key is not accepted or valid, the motor and operation to the electric components of the vehicle are disabled. See Col. 15, lines 35-45. Simply stated, Sakamoto goes to great lengths to limit the access to the network to only specified vehicles. On the other hand, Sato has no need for a secure communication system because communication only occurs within the vehicle in Sato.

Therefore, even if Sato were combined with Sakamoto, the combination would lead to a vehicle communication device that limits access to only those vehicles having the apparatus, key card *and* the correct ID to communicate within the system, effectively teaching away from the

claimed invention. The cited combination would defeat the purpose of the invention, as it is desirable that communication occurs between an image receiving unit within the first vehicle equipped with the vehicle outside-image display apparatus and different "second cameras" that do not require key cards and individual ID codes. Thus, the invention communicates with other vehicles having the invention with no need for security measures. Also, the speed of communication is important in the invention, as a vehicle equipped with the invention needs to receive, combine and display the image in time to give the operator advance warning of upcoming directions. Therefore, having any type of security measures would consume limited system resources that would be otherwise be used for communication and data processing, ultimately slowing the system down.

Both the invention and the cited combination establish communications between vehicles. But the cited combination wants to limit the number within the communications network, whereas it is very desirable in the invention that the number within the communication network is as large as possible.

Therefore, even if Sakamoto were combined with Sato, the claimed invention in claims 1, 9 and 10 would not be rendered obvious by the prior art of record.

Also in regards to the combination of Sato and Sakamoto, Sakamoto is a key-card based data communication system that allows radio communication between the two vehicles, which is primarily used for the tourism industry. One of ordinary skill in the art of vehicle-based imaging would not look to a device for providing navigational guidance to tourists using secure radio communications between vehicles. Thus, the combination between Sato and Sakamoto is not proper.

Regarding claim 6, it was rejected under 35 U.S.C. 103(a) as being unpatentable over Sato in view of Franz (WO No. 2003/060826), hereinafter “Franz”. As argued above, and as claim 6 is dependent from claim 1, Sato fails to disclose that an image combining unit combines “the vehicle outside-image information which is obtained by combining the vehicle outside-image information captured by the first vehicle with the vehicle outside-image information captured by the second vehicle ahead of the first vehicle” received from the first vehicle with “the image captured by the vehicle outside-image capturing unit” to produce renewed vehicle outside-image information as limited by claim 1. Further, Applicant respectfully submits that there is no teaching of having a second vehicle (*that is ahead of the vehicle*) capturing outside-image information and combining the second outside-image information with a first vehicle (*that is ahead of the vehicle*) outside-image information in Franz. Therefore, even if Franz were combined with Sato, every limitation of claim 6 would not be taught, suggested, or otherwise rendered obvious by the resulting combination. Thus, claim 6 is nonobvious.

Regarding claim 8, it was rejected under 35 U.S.C. 103(a) as being unpatentable over Sato in view of Ide et al. (U.S. Publication No. 2001/0012016), hereinafter “Ide”. As argued above, and as claim 8 is dependent from claim 1, Sato fails to disclose that an image combining unit combines “the vehicle outside-image information which is obtained by combining the vehicle outside-image information captured by the first vehicle with the vehicle outside-image information captured by the second vehicle ahead of the first vehicle” received from the first vehicle with “the image captured by the vehicle outside-image capturing unit” to produce renewed vehicle outside-image information as required by claim 1. Further, Applicant respectfully submits that there is no teaching of having a second vehicle (*that is ahead of the vehicle*) capturing outside-image information and combining the second outside-image

information with a first vehicle (*that is ahead of the vehicle*) outside-image information in Ide. Therefore, even if Ide were combined with Sato, every limitation of claim 8 would not be taught, suggested, or otherwise rendered obvious by the resulting combination. Thus, claim 8 is nonobvious.

In light of the foregoing, it is respectfully submitted that the present application is in condition for allowance and notice to that effect is hereby requested. If it is determined that the application is not in condition for allowance, the Examiner is invited to initiate a telephone interview with the undersigned attorney to expedite prosecution of the present application.

If there are any additional fees resulting from this communication, please charge same to our Deposit Account No.: 16-0820, our Order No.: NGB-40152.

Respectfully submitted,

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